

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EAGLE TELECONFERENCING SERVICES, INC.

No. 07 7827 (NRB)

Plaintiff,

CIVIL ACTION

V.

COMPUNETIX, INC.

Defendant.

JURY TRIAL DEMANDED

**EAGLE TELECONFERENCING SERVICES, INC.'S REQUEST FOR PRODUCTION
OF DOCUMENTS DIRECTED TO DEFENDANT (FIRST SET)**

Plaintiff, EAGLE TELECONFERENCING SERVICES, INC., by and through their counsel, Harry J. Friedberg, requests that Defendant produce the following materials pursuant to the Federal Rules of Civil Procedure, within thirty (30) days.

1. All internal memoranda, notes, records, e-mails pertaining to the issues raised by Plaintiff in its claim and Defendant in its counterclaim.
2. All reports, notes memoranda of pre-production and post production reports, test procedures and results, including rejections for the manufacture of the unit that is the subject matter of this litigation.

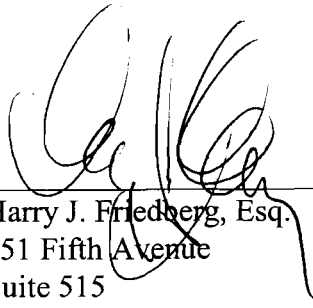
3. Names and address of all employees, including their employment records, who are employed in the production of the unit that is the subject matter of this litigation.
4. Identification, invoices, bills, notes, records of all supplies of any materials used in connection with the manufacture of the unit that is the subject matter of this litigation.
5. Records pertaining to or indicating the manufacture of the unit or similar units at any time within the last past 5 years to date.
6. All sales and or promotion materials for the manufacture of the unit or similar unit.
7. Any and all records of rejection by any customer or entity, of any unit or similar unit for the last past 5 years to date.
8. All sales invoices and paid checks of proof that only EAGLE received the discount on the pricing of the unit.
9. Show all emails and correspondence showing the pricing information to other clients for similar products.
10. Show the first invoice with full price to EAGLE before discount negotiations began.
11. Show all correspondence with EAGLE email or otherwise to show forth the discounts were given as a preliminary rule to entice EAGLE as a customer.
12. Provide all internal correspondence between Jerry Boynick and Jerry Pompa in regard to EAGLE.
13. Show all correspondence between Jerry Pompa and any senior executives relating to EAGLE.
14. Show all details on all customers who have similar pricing of EAGLE.

15. Provide all documents relating to Chorus Call INDIA and COMPUNETIX, include pricing, investment, invoices, customs duty paid etc.,.
16. Provide detailed corporate structure and officers and stock holders of Defendant.
17. Show any and all affiliated companies through which COMPUNETIX competes with its own customers (include all affiliated companies through ESOP, Chairman's personal companies etc.).
18. Show internal details or notes in relation to support of the unit to EAGLE.
19. Show all costs relating to raw materials in packaging the conferencing system.
20. Show all mark ups and costing methodologies in relation to pricing of COMPUNETIX box.
21. Show any and all customer of COMPUNETIX who is providing SIP based conferencing.
22. Show details on how many conferencing boxes in the market providing conferencing and show all details on the customer problems, complaints and service..
23. Show trouble tickets issued or related EAGLE and all companies with similar problems.
24. Provide educational credentials of the trainer(s) and their superiors who went to EAGLE offices.
25. Provide all internal correspondence between the trainer(s) and COMPUNETIX staff.
26. Provide information on when the unit became SIP ready.
27. Provide first installation date of the IP/SIP based Conference Bridge.
28. Provide log files of call recording of your customer service center.

29. Provide Bill Volt's, support manager of COMPUNETIX, educational qualifications to operate in such capacity.
30. Provide correspondence between Bill Voltz and Jerry Boynick.
31. Provide any white papers of the unit or customer case study done by COMPUNETIX.
32. Who made the first contact with EAGLE, provide all correspondence.
33. Provide initial sales quote to EAGLE.
34. Provide all negotiating correspondence with EAGLE.
35. Provide Defendant's certifications from FCC or other regulatory agencies to operate or manufacture the conferencing systems.
36. Provide Defendant's business registrations in the state of Iowa, Illinois and New York
37. Provide sales tax certifications for above states for al similar products.
38. Provide correspondence with EAGLE employees.
39. Provide documents and information on other customers who refused to pay Defendant's bills and or having problems with your systems.

Production of the requested documents and things will be at the offices of Harry J. Friedberg. This request is deemed to be continuing in that any documents, photographs, statements, reports or other tangible things secured subsequent to the date herein for the production of same are to be provided to defendant's counsel within thirty (30) days of receipt of same.

Dated: November 27, 2007



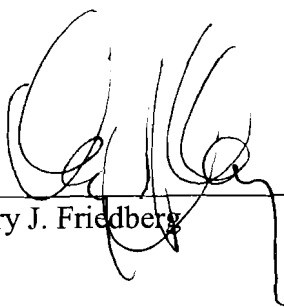
Harry J. Friedberg, Esq.
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Suite 515
New York, NY 10176
212-836-1100
Attorney for Plaintiff, Eagle
Teleconferencing Services, Inc.

Certificate of Service

This is to certify that I have this 27th day of November 2007, served a true and correct copy of the foregoing Eagle Teleconferencing Services, Inc's Request for Production of Documents Directed to Defendant (First Set) upon opposing counsel by sending a copy via first class mail, postage prepaid and addressed to:

Counsel for Defendant Compunetix, Inc.

Reed Smith LLP
599 Lexington Avenue
New York, NY 10022



Harry J. Friedberg